Ford Elsaesser, ISB #2205 Bruce A. Anderson, ISB #3392 Katherine Elsaesser, ISB #9287 ELSAESSER ANDERSON, CHTD. 320 East Neider Avenue, Suite 102 Coeur d'Alene, ID 83815 Tel: (208) 667-2900

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brucea@eaidaho.com katie@eaidaho.com

Attorneys for Debtor-in-Possession

UNITED	) STATES	BANKRI	UPTCY	COURT
FOR	THE DIS	TRICT OF	MONT	ANA

In re:

Case No. 17-60271

Roman Catholic Bishop of Great Falls, Montana, a Montana Religious Corporate Sole (Diocese of Great Falls),

Chapter 11

Debtor-in-Possession.

## AFFIDAVIT OF PUBLICATION NOTICE

STATE OF IDAHO	)
	)ss
COUNTY OF BONNER	)

- I, Katherine Elsaesser, being duly sworn upon her oath, deposes and states:
- 1. I am a resident of the State of Idaho;
- 2. I am a competent person over the age of 18 years;
- 3. I caused publication notice of the Hearing and Deadline to Object to Plan Confirmation and Settlement Agreement with Catholic Mutual Insurance Company (attached hereto as Exhibit A) to occur as follows:
  - a. In USA Today Publication on July 17th, 2018 and July 30, 2018.

b. In the July 2018 edition of the Harvest, the monthly publication published by the Diocese of Great Falls Billings in Montana.

ELSAESSER ANDERSON, CHTD.

Katherine Elsaesser

SUBSCRIBED AND SWORN before me on this

day of August, 2018.

Votary Public for Idaho

Commission expires (0/20



## CERTIFICATE OF SERVICE

I, Lisa McCumber, declare as follows:

I am employed by Elsaesser Anderson, Chtd., Coeur d'Alene, Idaho; I am over the age of eighteen years and not a party to this action; the firm's business address is 320 East Neider Avenue, Suite 102, Coeur d'Alene, Idaho 83815.

I certify that on August 13, 2018, I served the foregoing on all ECF participants as indicated on the Court's ECF system.

Additionally, by regular first class mail, I mailed a copy to the following governmental parties:

Internal Revenue Service Centralized Insolvency Operation Post Office Box 7346 Philadelphia, PA 19101-7346 Montana Department of Revenue PO Box 7701 Helena MT 59604-7701

I swear under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

Dated: August 13, 2018

/s/Lisa McCumber

Lisa McCumber

## BANKRUPTCY COURT FOR THE DISTRICT OF MONTANA In re: The Roman Catholic Bishop of Great Falls, Montana, a Montana Religious Corporate Sole

In re: The Roman Catholic Bishop of Great Falls, Montana, a Montana Religious Corporate Sole (Diocese of Great Falls) ("Debtor") Case No. 17-60271

NOTICE OF HEARING AND DEADLINE TO OBJECT TO PLAN CONFIRMATION AND SETTLEMENT AGREEMENT WITH CATHOLIC MUTUAL INSURANCE COMPANY ("CMRS").

NOTICE IS GIVEN THAT AT THE HEARING ON AUGUST 14, 2018 AT 9:30 A.M., UNITED STATES BANKRUPTCY COURT, 400 N. MAIN, SECOND FLOOR COURTROOM, BUTTE, MONTANA ("HEARING") ON CONFIRMATION OF THE DEBTOR'S CHAPTER 11 PLAN OF REORGANIZATION ("PLAN"), THE DEBTOR WILL SEEK, AMONG OTHER THINGS, APPROVAL OF ITS SETTLEMENT AGREEMENT WITH CMRS ("SETTLEMENT AGREEMENT") AND COURT APPROVAL OF THE PLAN. THE SETTLEMENT AGREEMENT, INCORPORATED BY THE PLAN, PROVIDES THAT CMRS SHALL PARTIALLY FUND A TRUST FOR PAYMENT OF ALLOWED TORT CLAIMS BY MAKING A SETTLEMENT PAYMENT TO OBTAIN THE BENEFIT OF CERTAIN RELEASES AND INJUNCTIONS AS MORE PARTICULARLY DESCRIBED IN THE PLAN. CMRS WILL MAKE ITS SETTLEMENT PAYMENT TO THE DIOCESE OF GREAT FALLS TRUST (AS DEFINED IN THE PLAN) AS PROVIDED BY THE PLAN. ALL "ABUSE CLAIMS" (AS DEFINED IN THE PLAN) WILL BE CHANNELED TO THE DIOCESE TRUST AS THE SOLE AND EXCLUSIVE SOURCE OF PAYMENT OF ANY SUCH CLAIMS. IN ADDITION, PURSUANT TO THE SETTLEMENT AGREEMENT AND PLAN, THE COURT WILL APPROVE RELEASES AND INJUNCTIONS PERMANENTLY BARRING ALL TORT CLAIMS BY ANY ENTITY (AS DEFINED IN THE PLAN, INCLUDING TORT CLAIMANTS, THAT ARISE OR OCCUR PRIOR TO THE EFFECTIVE DATE OF THE PLAN AGAINST CMRS AND THE CERTIFICATES ISSUED BY CMRS TO THE DIOCESE PARTIES OR COVERED ENTITIES (AS DEFINED IN THE PLAN). THE SETTLEMENT AGREEMENT AND PLAN ALSO REQUIRE THAT THE ORDER CONFIRMING THE PLAN ENJOIN ALL ABUSE, CONTRIBUTION, DIRECT ACTION, EXTRA-CONTRACTUAL OR OTHER IDENTIFIED CLAIMS AGAINST CMRS (AS EACH TYPE OF CLAIM IS DEFINED IN THE PLAN). THIS DESCRIPTION OF THE RELIEF SOUGHT BY THE PLAN SETTLEMENT AGREEMENT ARE SUMMARY ONLY. REVIEW THE PLAN AND DISCLOSURE STATEMENT FILED BY THE DEBTOR, IN THEIR ENTIRETY, FOR A DETAILED DESCRIPTION OF THE RELIEF SOUGHT. YOU MAY OBTAIN A COPY OF THE PLAN AND DISCLOSURE STATEMENT FROM THE CLERK OF THE BANKRUPTCY COURT OR BY CONTACTING DEBTOR'S COUNSEL AT: ELSAESSER ANDERSON, 320 EAST NEIDER AVENUE, SUITE 102, COEUR D'ALENE, ID 83815, (208) 667-2900.

IF YOU HAVE A CLAIM AGAINST THE DEBTOR OR DIOCESE PARTIES (AS DEFINED IN THE PLAN) AS TO WHICH COVERAGE UNDER THE CERTIFICATES ISSUED BY CMRS IS OR MAY BE AVAILABLE, YOUR RIGHTS MAY BE AFFECTED.

Objections, if any, to the confirmation of the Plan and Settlement Agreement must (i) be in writing, (ii) state the name and address of the objecting party and the nature of the claim or interest of such party, (iii) state with particularity the basis and nature of each objection to confirmation of the Plan and (iv) be filled, together with proof of service, with the Court (with a copy Chambers) and served so that they are received no later than 5:00 p.m., on July 31, 2018, by (a) Eisaesser Anderson, Chtd., 320 East Neider Avenue, Suite 102, Coeur d'Alene, ID 83815. Objections not timely filed and served in the manner set forth above shall not be considered and shall be overruled.

DATED this 12 day of July, 2018.



July 13, 2018

Katie Elsaesser Attorney at Law ELSAESSER ANDERSON, CHTD. 519 High Street P.O. Box 369 Priest River, ID 83856

Dear Katie:

I'm pleased to confirm the following advertising for the Diocese of Great Falls-Billings.

DATES:

July 17 and July 30

**UNIT:** 

3-columns x 5-inches

PLACEMENT:

Marketplace Classified - Legal Notices

RATE:

\$10,732.50 net per insertion

**DEADLINES**:

Materials are due Friday, July 13 in digital format (PDF).

**PAYMENT:** 

Prepaid

Your signature below indicates that you are in agreement with the above terms and conditions. Please sign and fax to my attention at 703/854-2111. We appreciate your business.

USA TODAY may, at its sole discretion, edit, classify, reject or cancel at any time any advertising submitted by an advertiser.

Best regards,

**Toussaint Hutchinson** 

Account Director - Integrated Brand Solutions

Katie Elsaesser, Attorney

ELSAESSER ANDERSON, CHTD.